

### REMARKS

Claims 18-22, 24-32, 35, and 36 are pending in the application. Claims 18-22, 24, 25, 27, 28, and 30-32 are rejected under 35 USC 103(a) as being anticipated by US patent 6,885,658 B1 (Ress et al.) in view of US patent 7,379,475 B2 (Minami et al.). Claim 26 is rejected under 35 USC 103(a) as being unpatentable over Ress in view of Minami and in view of US patent 7,031,279 B2 (Lee et al.). Claim 29 is rejected under 35 USC 103(a) as being unpatentable over Ress in view of Minami and in view of US patent US patent 6,363,065 B1 (Thornton et al.). Claims 35 and 36 are rejected under 35 USC 103(a) as being unpatentable over Ress et al.

Claims 18-22, 24-32, 35, and 36 are canceled herein. Claims 37-51 are newly presented for examination. Page, paragraph, and line numbers of Applicants' specification mentioned herein are relative to the substitute specification

### Description of claim amendments

The Examiner seems to interpret the base claims 18 and 35 as if the claimed first and second communication endpoints are the same (Office Action page 3, lines 18-19, and page 11, lines 12-13). In order to clearly recite Applicants' network topology of FIG 1 and the methods of FIGS 2 and 3, the claims have been rewritten. The preamble of the new independent claim 37 recites a network topology as shown in Applicants' FIG 1. The body of claim 37 recites the methods of FIG 2 and 3 generically as described in paragraphs 30-34 and 36-38. Claim 38 recites the method of FIG 2 as described in paragraphs 30-34. Claim 39 recites the method of paragraph 35. Claim 50 recites the method of FIG 3 as described in paragraphs 36-38. Claim 51 recites the method of paragraph 39. When "a third" terminal is recited in the claims, this element is "another terminal" of paragraph 35, line 4 or paragraph 50, line 5.

Response to rejections under 35 USC 103(a)

Examiner's interpretation of the previous claims resulted in FIG 14 of Ress being cited as the base reference, even though FIG 14 of Ress is totally unlike Applicants' FIGs 2 or 3, as now claimed herein. Ress FIG 14 is contrasted with applicants' FIGs 2 or 3 below:

1. In Ress FIG 14, closure of a logical channel is initiated by the second terminal 1400. In Applicants' FIGs 2 and 3, closure is initiated by the first signaling control device GKA.
2. In Ress FIG 14, a closure request LC1 is required in addition to a TCS=0 message from the agent 1402, to request closure of a channel. In Applicants' FIGs 2 and 3, closure is requested by the signaling control device GKA within the TCS0 message itself.
3. In Ress FIG 14 all closure requests and confirmations occur between the first terminal 1200 and the agent 1402. In Applicants' FIGs 2 and 3, a closure request message (CLC) is sent transparently from the first to the second terminal, and a closure confirmation (CLCAck) is returned transparently from the second terminal to the first terminal.
4. In Ress FIG 14, there is no peer-to-peer connection control signaling between the first and second terminals. Thus status of all connections must be maintained and synchronized by the call agents 1402, 1403. In Applicants' FIGs 2 and 3, there is peer-to-peer connection control signaling (CLC, CLCAck, OLC, OLCAck), so central synchronization is not needed.
5. In Ress FIG 14, closure of logical data channel(s) by the first terminal 1200 is never confirmed to the second terminal 1400. The call agents 1402 and 1403 are completely responsible for managing the connections and verifying that the changes have been made.

Ress has the noted disadvantage of prior connection management schemes described in Applicant's paragraph 5. The present invention overcomes this disadvantage per paragraph 10. Reversing the "first" and "second" terminal designations in Ress does not cure the above distinctions.


Conclusion

Ress clearly lacks aspects of the invention as presently claimed, as argued above. Minami, Lee, and Thornton do not correct the deficiencies of Ress for the claims herein, including independent claim 37. Thus, the proposed combinations do not produce the invention as claimed. Furthermore, modifying Ress to meet the claimed invention would change the mode of operation of Ress, making the modification unobvious. Therefore the cited combinations do not support rejections under 35 USC 103. Applicants feel this application is in condition for allowance, which is respectfully requested.

The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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